

FAEGRE DRINKER BIDDLE & REATH LLP

ANDREW S. AYALA (SBN 332261)

andrew.ayala@faegredrinker.com

1800 Century Park East, Suite 1500

Los Angeles, California 90067

Telephone: (310) 203-4000

Facsimile: (310) 229-1285

TYLER A. YOUNG (*Pro Hac Vice* Forthcoming)

tyler.young@faegredrinker.com

RORY F. COLLINS (*Pro Hac Vice* Forthcoming)

rory.collins@faegredrinker.com

2200 Wells Fargo Center

90 South Seventh Street

Minneapolis, MN 55402

Telephone: (612) 766-7000

Facsimile: (612) 766-1600

Attorneys for Defendant

TARGET CORPORATION

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

JENNIFER DEFOREST,
individually and on behalf of others
similarly situated,

Plaintiff,

vs.

TARGET CORPORATION,

Defendant.

Case No. 8:25-cv-0851

[Orange County Superior Court, Case
No. 30-2025-01467748-CU-NP-CXC]

**DECLARATION OF BRANDON
JOHNSON IN SUPPORT OF
NOTICE OF REMOVAL**

Complaint filed: March 14, 2025

Date Removed: April 23, 2025

1 I, Brandon Johnson, declare as follows:

2 1. I am the Sr. Financial Analyst at Target Corporation, located at 1000
3 Nicollet Mall, Minneapolis, MN 55403. I have personal knowledge of the facts stated
4 herein and if called as a witness could competently testify thereto.

5 2. I understand that the plaintiff in this action, Jennifer Deforest, alleges
6 claims on behalf of a class of “[a]ll persons within the United States” and a sub-class
7 of “[a]ll persons within California” who purchased certain Good & Gather pasta sauce
8 products (the “Products”)¹ from Target “within four years prior to the filing of the
9 Complaint.”

10 3. I understand the complaint was filed on or about March 14, 2025.

11 4. I have reviewed Target’s records kept in the ordinary course of business
12 and can confirm that Target sold more than 3 million units of the Products to more
13 than 100 customers in California during the proposed class period. The gross revenue
14 from California sales of the products during the proposed class period exceeded
15 \$6,000,000.

16 I declare under penalty of perjury of the laws of the United States of America
17 that the foregoing is true and correct.

18 Executed at Minneapolis, Minnesota on April 22, 2025.

19
20 
21

22
23
24
25
26
27 ¹ The Complaint defines the Products as including the following varieties of Good &
28 Gather pasta sauce: Mushroom pasta sauce; Traditional pasta sauce; Tomato, basil &
garlic pasta sauce; Marinara; Garden combo pasta sauce; Organic roasted garlic pasta
sauce; Organic tomato basil pasta sauce; Organic three cheese pasta sauce; and
Organic marinara.